

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP,  
CALIFORNIA STATE TEACHERS'  
RETIREMENT SYSTEM, SONTERRA CAPITAL  
MASTER FUND, LTD., FRONTPOINT  
PARTNERS TRADING FUND, L.P., AND  
FRONTPOINT AUSTRALIAN OPPORTUNITIES  
TRUST on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

BARCLAYS PLC, BARCLAYS BANK PLC,  
BARCLAYS CAPITAL INC., BNP PARIBAS S.A.,  
CITIGROUP, INC., CITIBANK, N.A.,  
COÖPERATIEVE CENTRALE RAIFFEISEN-  
BOERENLEENBANK B.A., CRÉDIT AGRICOLE  
S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE  
BANK AG, DB GROUP SERVICES UK  
LIMITED, HSBC HOLDINGS PLC, HSBC BANK  
PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P.  
MORGAN CHASE & CO., JPMORGAN CHASE  
BANK, N.A., THE ROYAL BANK OF  
SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA,  
UBS AG AND JOHN DOE NOS. 1-50,

Defendants.

No. 13-cv-02811 (PKC)

**DECLARATION OF DAVID  
IRELAND ON BEHALF OF ICAP  
PLC IN SUPPORT OF FOREIGN  
DEFENDANTS' MOTION TO  
DISMISS FOR LACK OF  
PERSONAL JURISDICTION**



I, David Ireland, declare under penalty of perjury as follows:

1. I am Chief Financial Officer, Group Finance, for ICAP plc in London, United Kingdom.
2. I submit this Declaration on behalf of ICAP plc in support of Foreign Defendants' Motion to Dismiss for Lack of Personal Jurisdiction. This Declaration is based upon my personal knowledge unless otherwise noted and is true and correct to the best of my knowledge and belief.
3. ICAP plc is a non-operational holding company, organized under the laws of the United Kingdom.
4. ICAP plc has its registered office in London, United Kingdom. ICAP plc has no offices within the United States.
5. ICAP plc has no employees and conducts no operations.
6. Shares of ICAP plc are traded on the London Stock Exchange. ICAP plc does not list shares on any other global exchange.
7. ICAP plc sponsors Level 1 American Depositary Receipts ("ADRs") within the United States.
8. ICAP plc does not maintain any bank accounts in the United States.
9. ICAP plc does not pay taxes to the United States government.
10. ICAP plc does not broker trades, does not employ interdealer brokers, and has never communicated with Euribor panel banks regarding Euribor submissions.
11. I, David Ireland, Chief Financial Officer, Group Finance, for ICAP plc, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.



Executed in London, United Kingdom on 9 October, 2015.

A handwritten signature in dark ink, appearing to read 'D. Ireland', written over a horizontal line.

David Ireland